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9 Attorneys for Defendant  
JASON EDWARD THOMAS CARDIFF  
10

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS  
18 CARDIFF,

19 Defendant.  
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Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN R.  
COCHELL IN SUPPORT OF  
JASON CARDIFF'S RESPONSE TO  
GOVERNMENT'S *EX PARTE*  
APPLICATION FOR AN ORDER  
FOR: (1) DECLARATION OF  
FUGITIVE STATUS, (2) ORDER  
VACATING TRIAL DATE AND  
TOLLING OF SPEEDY TRIAL  
ACT, AND (3) ISSUANCE OF  
ARREST WARRANT**

DECLARATION OF STEPHEN R. COCHELL

I, Stephen R. Cochell, declare as follows:

1. I represent Jason Cardiff in this matter. I make this declaration in support of Jason Cardiff's Ex Parte Application for : (1) Declaration Of Fugitive Status, (b) Order Vacating Trial Date And Tolling Of Speedy Trial Act and (c) Issuance Of Arrest Warrant
2. A true and accurate copy of an email chain between Government counsel and I is attached as Exhibit 1 to this Response.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 3d day of September, 2024, at Los Angeles, California.

/s/ Stephen R. Cochell  
Stephen R. Cochell

Dated: February 5, 2025



Stephen Cochell <srcochell@gmail.com>

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**Re: [EXTERNAL] Re: Government's Motions re: Cardiff**

1 message

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**Stephen Cochell** <srcochell@gmail.com>

Mon, Feb 3, 2025 at 10:19 AM

To: "Makarewicz, Valerie (USACAC)" <Valerie.Makarewicz@usdoj.gov>

The authority for asking for the documents rests with the Court's inherent authority to enforce its orders and to sanction those who violate those orders.

The Local Rules require that we talk about the motions before filing a motion, including your motion to declare Mr. Cardiff a fugitive and regarding forfeiture of bond. .

On Sun, Feb 2, 2025 at 6:07 PM Makarewicz, Valerie (USACAC) <Valerie.Makarewicz@usdoj.gov> wrote:

Given our last contact via telephone, your distortion of what actually occurred in your email, and your unnecessary and irrelevant use of it against the government, we will only proceed discussing issues that arise in this matter in writing with you going forward.

As for your discovery request, we deny your request for the documents. If you have authority as to why these documents are relevant and/or must be turned over by the government, please provide.

I'm unclear as to what there is to discuss regarding the government's proposed motions. Please describe in writing what specifically you'd like to discuss regarding the government's motion.

Finally, if you have questions regarding the statements made on Thursday, please purchase a transcript as this is the official record of the proceedings.

VLM

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**From:** Stephen Cochell <srcochell@gmail.com>

**Sent:** Sunday, February 2, 2025 1:53 PM

**To:** Makarewicz, Valerie (USACAC) <VMakarewicz@usa.doj.gov>; Sebastian, Manu J. <Manu.J.Sebastian@usdoj.gov>

**Subject:** Re: [EXTERNAL] Re: Government's Motions re: Cardiff

We believe that L.R. 7-3 requires the parties to confer in person (if feasible) or at least by phone if necessary. Insisting that we put everything in writing does not comply with the rule. We want to discuss your intention to seek declaring Mr. Cardiff a fugitive and seeking bond forfeiture. We again request that the extradition file be produced and that the Government produce any correspondence/communications between you, Mr. Sebastian, the Department of Justice, Federal Trade Commission and the State Department including but not limited to the U.S. Embassy in Dublin relating to Mr. Cardiff's extradition or arrest on January 14, 2025. I am flexible in discussing this with you tomorrow

As to our motion regarding the Fourth Amendment violation, we want to confirm Mr Sebastian's statements from last Thursday. As I understand it. Mr. Sebastian told the Court that the extradition warrant was cancelled. That neither you nor Mr. Sebastian were directly or indirectly involved in requesting the Garda to effect the arrest. Mr. Sebastian represented that the Garda offered Mr. Cardiff the opportunity to make a phone call or turn over his and his wife's passports. The Cardiffs turned over their passports. .

On Sun, Feb 2, 2025 at 12:35 PM Makarewicz, Valerie (USACAC) <Valerie.Makarewicz@usdoj.gov> wrote:

We prefer that everything be in writing going forward. Please put the contents of your proposed meet and confer in an email and we will respond accordingly. VLM

**From:** Stephen Cochell <srcochell@gmail.com>  
**Sent:** Saturday, February 1, 2025 5:30 PM  
**To:** Makarewicz, Valerie (USACAC) <VMakarewicz@usa.doj.gov>; Sebastian, Manu J. <Manu.J.Sebastian@usdoj.gov>  
**Subject:** [EXTERNAL] Re: Government's Motions re: Cardiff

Sorry I'm flexible Monday if that works for you  
Sent from my iPhone

On Feb 1, 2025, at 3:33 PM, Stephen Cochell <srcochell@gmail.com> wrote:

We request a meet and confer on our motion on the extradition arrest. I am flexible tomorrow if that works for you.

On Fri, Jan 31, 2025 at 2:43 PM Stephen Cochell <srcochell@gmail.com> wrote:  
Ms. Makarewicz,

We oppose these motions.

However, I think you have the dates wrong. L.R. 7-3 requires a conference at least 7 days prior to the motion. The first available hearing date is March 10.

We anticipate filing a motion for appropriate relief (e.g. contempt) for interfering with the Court's Order with a hearing date as set out in our motion and reply memorandum discussed yesterday.

On Fri, Jan 31, 2025 at 12:39 PM Makarewicz, Valerie (USACAC) <Valerie.Makarewicz@usdoj.gov> wrote:

Mr. Cochell,

Pursuant to LR 7-3, and previewed yesterday, the government writes to inform you of its intention to file two motions:

1. Motion to declare defendant a fugitive, to suspend deadlines under the Speedy Trial Act and to issue bench warrant.
2. Motion for Order Forfeiting Bail.

The motions will be calendared for hearing on March 3, 2025.

Thank you, VLM

Valerie Makarewicz  
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1100 U.S Courthouse  
312 North Spring Street  
Los Angeles, California 90012  
Tel: (213) 894-0756  
E-mail:valerie.makarewicz@usdoj.gov

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